

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) ROBERT BALES and)
(2) DANIELLE BALES,)
)
 Plaintiffs,)
)
-vs-) Case No. 22-cv-00851
)
(1) STATE FARM FIRE AND)
CASUALTY COMPANY,)
)
 Defendant.)

* * * * *

DEPOSITION OF DANIELLE BALES
TAKEN ON BEHALF OF THE DEFENDANT
TAKEN AT 525 SOUTH MAIN STREET
TULSA, OKLAHOMA
JULY 21, 2023

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BALLARD REPORTING
611 WEST 15TH STREET, C-3
TULSA, OKLAHOMA 74127
(918) 407-2278
ballardreporting@gmail.com

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REPORTED BY: ASHLEY BALLARD, CSR

1 Q. The address I read off on your driver's license,
2 that's the address you currently live in; is that --
3 A. Yes.
4 Q. -- correct?
5 How long have you resided at that address?
6 A. we've been there since December of 2020.
7 Q. Who lives at that address with you?
8 A. Robert; our children, Gelsomina and Josiah.
9 Q. Can you spell those names for me, please?
10 A. Gelsomina is G-e-l-s-o-m-i-n-a. Josiah is
11 J-o-s-i-a-h.
12 Q. How old is Gesolina?
13 A. Gelsomina --
14 Q. Gelsomina.
15 A. -- is 12.
16 Q. And how old is Josiah?
17 A. Fourteen.
18 Q. Anyone else reside at that address?
19 A. No.
20 Q. Do you guys live over by BattleCreek?
21 A. Yes.
22 Q. Okay. You purchased this house in 2020; is that
23 what you said?
24 A. Yes.
25 Q. Did you guys make any roof repairs?

1 A. No.

2 Q. Did you make any upgrades to the home?

3 A. No. Well, we did get it inspected.

4 Q. When did you get it inspected? When you bought it?

5 A. Bought it, yes.

6 Q. Do you recall who inspected it?

7 A. No.

8 Q. Do you recall any issues with the home during the
9 purchase?

10 A. No.

11 Q. Did you guys get any damage to your home from the
12 recent Father's Day storm?

13 A. Yes.

14 Q. What kind of damage?

15 A. Well, there was shingles in our backyard.

16 Q. Do you recall how many?

17 A. No.

18 Q. Do you know where the shingles came from?

19 A. The roof.

20 Q. Well, again, dumb question. Do you know what part
21 of the roof the shingles came from?

22 A. Mostly it's on -- where the tarp is on the ...

23 Q. The west side?

24 A. Yes.

25 Q. Are shingles still missing from your roof?

1 A. Absolutely not.

2 Q. Have you ever been on a roof?

3 A. When I was a child, yes.

4 Q. Never done any roof repairs?

5 A. Never.

6 Q. Any training on a roof?

7 A. Never.

8 Q. Any training on what's hail damage, what's wind

9 damage, things --

10 A. No clue. No.

11 Q. I want to talk about the claim itself that we're

12 here to talk about today; okay?

13 A. Okay.

14 Q. When did you first receive notice that there was an

15 issue, there was a claim, there was storm damage?

16 A. I remember there was -- back in January of 2022

17 there was a storm and that's when we -- that's when

18 Rob went and asked for someone to come look at it.

19 And we noticed the -- I'm so terrible with

20 names. The roofing company that is assisting us,

21 they -- Rob saw their sign in a neighbor's yard and

22 asked them to come and look at our roof to see if

23 there was any damage.

24 And a lot of the roofs in the neighborhood

25 were damaged, because I remember a lot of them

1 getting fixed.

2 Q. Okay. So --

3 A. Around that time, in the spring.

4 Q. What gave you notice of the loss? Did your husband
5 tell you, Hey, something is going on, or did you see
6 something? Did you hear something? How did you
7 find out that there was a loss?

8 A. Well, there was -- I remember there was hail that
9 night. I remember the storm had hail. There's so
10 many storms that come through Oklahoma, so it's
11 extremely hard to, like, pinpoint. There's just so
12 many.

13 But I just remember there was hail and I
14 remember our furniture was -- our wicker furniture
15 was not on the porch. The pillows were blown.

16 I don't know anything about the roof. Like I
17 don't know what to look for or whatnot, so ...

18 Q. Well, some people, their first notice of a loss is
19 they might see shingles on the ground or they might
20 have a leak in their house. Did you observe any of
21 that?

22 A. I observed I want to say a couple of shingles on
23 the ground to the west side, actually, because it
24 was by the trash cans.

25 Q. How many shingles did you observe?

1 A. I don't remember. I just remember them being -- do
2 shingles come in three or two or like -- I just
3 remember there being quite a few long -- is that one
4 shingle?

5 Q. You remember seeing some --

6 A. Something.

7 Q. -- some shingles on the ground.

8 A. Yes.

9 Q. Fair enough?

10 A. Fair enough.

11 Q. Okay. Did you observe these the next day, or was
12 it that night of the storm when you first observed
13 these shingles?

14 A. The next day.

15 Q. Do you recall the actual date of the loss?

16 A. I do not.

17 Q. And the reason I ask is I've seen it referenced as
18 December of '21 and then January of '22. Do you
19 have any independent recollection of what the actual
20 date of loss might be?

21 A. There was storms in December and in January,
22 actually. But I think we -- I'm trying to -- gosh.
23 Yeah, I need a break, because ...

24 Q. Well --

25 A. That's right. You have to finish the question.